

United States District Court

for the

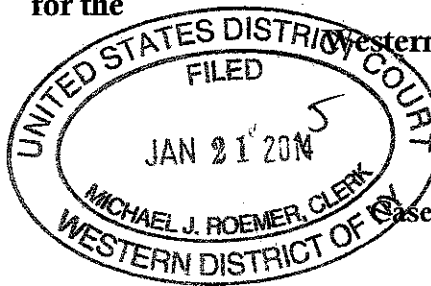
Western District of New York

United States of America

v.

JACOB SHAMP and
ASHLEE COOK

Defendants



Case No. 15-MJ- 515

CRIMINAL COMPLAINT

I, BARRY W. COUCH the complainant in this case, state that the following is true to the best of my knowledge and belief that in the Western District of New York, the defendants violated offenses described as follows:

On or about January 14, 2015, there is probable cause to believe that JACOB SHAMP and ASHLEE COOK have violated Title 18, United States Code, Sections 1591 and 1594(c), knowingly recruiting, enticing, harboring, transporting, providing and obtaining a person, that had not attained the age of 18 years and would be caused to engage in a commercial sex act, and conspiring with another to violate United States Code Section 1591.

SEE ATTACHED AFFIDAVIT OF SPECIAL AGENT BARRY W. COUCH.

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.

Complainant's signature

SA BARRY W. COUCH, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: January 21, 2015

Judge's signature

City and State: Rochester, New York

HONORABLE JONATHAN W. FELDMAN
UNITED STATES MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF MONROE) ss:
CITY OF ROCHESTER)

I, Barry W. Couch, having been first duly sworn, do hereby depose and state as follows:

1. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI). I have been so employed since November, 2008. I am currently assigned to investigations involving crimes against children, as well as other criminal investigations.

2. This affidavit is submitted for the limited purpose of establishing probable cause to believe that JACOB SHAMP, born xx/xx/1991, and ASHLEE COOK, born xx/xx/1990, while in the Western District of New York, knowingly recruited, enticed, harbored, transported, provided and obtained a person, that had not attained the age of 18 years and would be caused to engage in a commercial sex act, in violation of Title 18, United States Code Section 1591, and conspired with another to violate United States Code Section 1591, in violation of Title 18, United States Code Section 1594(c).

3. The information contained in this affidavit is based upon my personal knowledge and observation, my training and experience, conversations with other law enforcement officers and witnesses, and the review of documents and records. Because this

affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause that JACOB SHAMP and ASHLEE COOK did knowingly violate Title 18, United States Code, Sections 1591 and 1594(c).

4. On January 14, 2015, the Gates Police Department (PD) conducted an undercover operation investigating prostitution within the Town of Gates. Gates PD located an internet advertisement on Backpage.com under the escorts section in Rochester, New York, that appeared to be for prostitution. Backpage.com is an internet advertising website accessible throughout many States in the United States, including New York, and accessible in certain foreign countries as well, making it an instrument of interstate and foreign commerce. Gates PD called the phone number listed in the advertisement, 585-xxx-xxxx, spoke to a female, and arranged to receive sex for \$100 at a local Gates hotel.

5. Within the hour, a female arrived at the hotel in a vehicle and was let into the back door of the hotel by the undercover Gates police officer. The officer observed the female get out of the vehicle that had three other occupants. The female, Cooperating Witness #1 (CW1), later identified as being seventeen years old, came into the officer's hotel room, and made further agreements for the prostitution activity. CW1 ended up telling Gates PD that JACOB SHAMP "set up the whole thing".

6. Gates PD stopped the vehicle that had dropped CW1 off and identified the occupants. One of the occupants, JACOB SHAMP, provided his name and phone number. The phone number SHAMP provided as being his was the same phone number that was used in the Backpage.com prostitution advertisement: 585-xxx-xxxx. Another occupant in the vehicle identified themselves as ASHLEE COOK and COOK provided her phone number as 585-491-1563. The third occupant in the vehicle was identified as Cooperating Witness #2 (CW2).

7. Later that same day, FBI Agents spoke with SHAMP. SHAMP admitted to knowing CW1 and said he thought she was seventeen or eighteen years old. SHAMP stated that he drove CW1 to the Gates hotel to "get some money". SHAMP said he was aware an advertisement was placed on Backpage, that the advertisement included his phone number of 585-xxx-xxxx, and that the advertisement was placed from his phone. SHAMP stated that CW1 had asked him if she could place the advertisement and use his phone. SHAMP said he was told the advertisement was posted to find someone who would treat CW1 right.

8. Later that same evening, I and TFO Peter Uzarowski interviewed CW1. CW1 stated that she had been prostituting under JACOB SHAMP's directions for about two weeks, and that she had sex for money with about one to two men per day during the prior fourteen days, and she estimated that she had sex with a total of 15 to 20 men. CW1 stated that SHAMP pressured her into working as a prostitute. CW1 said she talked with SHAMP and ASHLEE COOK approximately two weeks prior about needing money and

applying for jobs. SHAMP told her that she could work as a prostitute and make a lot of money. CW1 stated that she did not want to do that, but SHAMP continued to pressure her. SHAMP would say things like, "you have to make this money." CW1 stated that SHAMP created a money splitting arrangement to where CW1 could keep 65% of the prostitution proceeds, while he kept 35%. CW1 estimated that she made approximately \$2000 in total before they split the money. CW1 stated that the prices were \$75 for oral sex, \$175 for sex, and \$230 for sex and oral sex. CW1 said that one night, she made about \$400 and after that, SHAMP told her she had to keep going, and keep making money. CW1 said the prostitution occurred at residences and at hotels in Rochester and Henrietta, New York.

9. CW1 stated that COOK rented a hotel room on one occasion for CW1 to prostitute in and that COOK would drive CW1 to the prostitution appointments. CW1 said that when they first started to prostitute her, SHAMP and COOK found clients on Craigslist under the "casual encounters" subheading. COOK would respond to the Craigslist clients and CW1 observed both COOK and SHAMP work on the replies together. The replies would be sent using both COOK's and SHAMP's phones. CW1 said that about a week prior, SHAMP and COOK composed a Backpage.com advertisement on COOK's phone. CW1 said COOK and SHAMP kept refreshing the advertisement. In other words, they used the same advertisement, but reposted it throughout the week. CW1 stated that the Backpage.com advertisement listed SHAMP'S cell phone number, and SHAMP would text clients back to arrange the escort appointment. CW1 recalled on one occasion a prospective client complained about the price. SHAMP called the individual and said not to question the price of his "slut." CW1 stated that about a week prior, CW2 addressed

COOK, SHAMP, and CW1 about CW1 working as a prostitute for COOK and SHAMP. CW2 told them all that what COOK and SHAMP were doing was wrong. CW2 told SHAMP and COOK that CW1 was only seventeen years old, and they could get in a lot of trouble for prostituting her. SHAMP and COOK however, continued to prostitute CW1. CW1 said that CW2 had nothing to do with the commercial sex operation and was against it from the beginning.

10. CW1 stated that SHAMP told her that he had other prostitutes working for him and that he had driven her to a specific location in Rochester and pointed out some of those girls. CW1 said that SHAMP told her that if she quit, he would “just get another bitch.” After CW1’s encounter with the Gates Police Department, SHAMP told CW1 that if she told the police of his involvement in her prostitution activities, he would put a “hit” out on her.

11. CW1 showed me text messages on her phone between herself and ASHLEE COOK, with COOK’s phone number being 585-491-1563. The text messages were dated from the prior Sunday (January 11, 2015) to that day, January 14, 2015, and consisted among other things, of COOK trying to persuade CW1 to prostitute. The text messages started out with COOK telling CW1, “Yes seriously do your hair..finish your makeup in the car we gta go”. CW1 soon followed with, “When I say I’m done tonight I’m done. There’s only so much of this I can do in one night.” COOK replied, “Ok that’s fine,dude wants to pay 300 for you..not right now but after this.” CW1 replied, “Is he coming here? And \$300 for what ?” COOK soon replied to CW1’s question by stating, “Hang and sex

I,think...not sure. And no,we gta go to the 300\$ dude...he said he's drunk can't drive". COOK soon texted CW1, "Can you just get the like 400+ dollars and let's go Its 6am...were all tired lol and the roads are so bad and scary". Later, CW1 texted COOK, "Jay going to work?" COOK responded, "IDK lol I think..". CW1 replied, "Well we can't do anything til he gets back anyway." COOK responded, "Yes we can...". CW1 replied, "Okay. What's my first one?" COOK responded, "K get your ass here. Locus st Off dewey. K". COOK later texted, "If you get 190\$ I get 60\$ out of it. Anyways the one that's picking you up is 60\$ so just give me 20\$." CW1 responded, "Ok". COOK later texted, "(CW1) if u want to make money u need to,hurry up and get here...you can get ready here. U take way to long lol really". CW1 responded, "I thought we was going to walmart? Wrf". COOK replied, "We r. .but we gta make money too. Dude in dansville wants to meet right now...u gta come here now". COOK soon followed with, "Get ready here dude it's like 200\$ and u make him wait your gna miss out in the money". COOK soon followed with, "Oh well?! Really (CW1). . 200\$??? And your gna say,oh well when u have no money...." COOK soon followed with, "You could do,your make up,while I am driving dude. You make no sense. I clearly know your broke duh that's why I said u need the money Nd it's 200\$,don't give me attitude". CW1 responded, "Don't boss me around telling me what to do then". COOK replied, "You don't have money,and complain your broke so get Here and we can go make money. If not then fuck it...and I AM NOT FUCKING BOSSING YOU AROUND DUDE IM TELLING YOU TO HURRY UP BECAUSE THE DUDE SAYS HE WANTS TO MEET RIGHT NOW FOR 200\$ AND ITS NOT FAR..ITS IN DANSVILLE. STOP WITH THE ATTITUDE DUDE..TAKE YOUR MEDS OR

SOMETHING nd chill the FUCK out. Dansville dude just asked where u were...so I guess forget it dude.” Later, COOK texted, “Got two 200\$ ppl”.

12. On January 16, 2015, TFO Uzarowski and I interviewed CW2. CW2 stated she lives with ASHLEE COOK. CW2 said that approximately two weeks prior, JACOB SHAMP, COOK’s boyfriend, started going online and finding people who wanted to have sex with CW1 for money. CW2 said CW1 told CW2 she did not want to work as a prostitute, but SHAMP kept pressuring her. COOK would drive CW1 to her appointments with the paying customers. CW2 remembered observing SHAMP being excited after he and COOK posted an escort advertisement on Backpage.com for CW1. SHAMP was receiving many text replies from the advertisement and was excited about the possibility of making a lot of money by having CW1 have sex with the men for money. About a week prior, while sitting in a car with CW1 in the driveway of one of SHAMP’s friends, CW1 told CW2 that she did not want to work as a prostitute. CW2 then told CW1 to text SHAMP and tell him that she wanted to stop. CW1 did so, and SHAMP responded, “why?” At that point, SHAMP came out to the car, and asked why CW1 wanted to stop, because SHAMP had more people lined up to have sex with CW1 for money. COOK came out of the house and came to the car. CW2 told COOK and SHAMP that it was not right, that CW1 was only seventeen years old. COOK said they were not forcing CW1 to do it. CW2 knew that SHAMP then kept pressuring CW1 to continue to work as a prostitute. CW2 stated she also overheard conversations between COOK, SHAMP, and CW1 where they discussed prostitution. CW2 said she also observed conversations in which COOK and SHAMP discussed splitting the profits earned by CW1. CW2 heard SHAMP say it was easy and fast

money.

13. On January 20, 2015, I interviewed SHAMP via telephone. I called SHAMP on the 585-xxx-xxxx telephone number that was listed in the Backpage.com advertisement, the same number SHAMP advised as being his to the Gates Police Department. SHAMP stated that he had gotten another phone and transferred the same number to that phone. I had the phone on speaker throughout the interview and it was overheard by TFO Chris Harrington as well. After advising SHAMP that I wanted to speak to him regarding the situation with the Gates Police Department and him, ASHLEE COOK, CW1 and CW2 the prior week, SHAMP stated, "Nothing was forced. Didn't make nobody do nothing. I didn't make none of this happen. There was no force, nothing. No need." SHAMP initially denied prostituting anyone. I told SHAMP I knew he was lying and that it had been verified by both CW1 and CW2. I then told SHAMP that the FBI knew the case, that I thought he and COOK needed money because they were down and out, made a poor decision, went along with CW1 in the prostitution, and that CW1 prostituted willingly with them and was not forced. SHAMP responded by saying twice in a row, "That's the whole situation. You got the case solved." SHAMP went on to claim that he and COOK did not see any of the money, but that CW1 did use some of the money to buy them pizza, cigarettes, toilet paper and other food. SHAMP confirmed that ASHLEE COOK was his girlfriend and that her telephone number was 585-491-1563.

14. Later that same day, I interviewed COOK via telephone. I called COOK on the 585-491-1563 telephone number she provided to the Gates Police Department as being

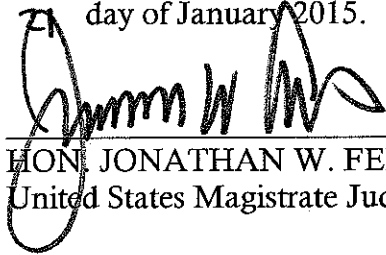
hers, that SHAMP confirmed as being hers, and that the text messages referred to in paragraph 11 above came from. I had the phone on speaker throughout the interview and it was overheard by TFO Chris Harrington as well. I advised COOK that I wanted to speak to her regarding the situation with the Gates Police Department and her, JACOB SHAMP, CW1 and CW2 the prior week. I told COOK that I knew that CW1 had prostituted, that COOK and SHAMP had gone along with it and made a little money, that no force was used, that CW1, CW2, and SHAMP had confirmed these things, and that I wanted to make sure COOK's story lined up with their's. COOK responded, "It does". COOK initially stated she drove and that was it, but later in the conversation COOK admitted that she and SHAMP received a little more than \$200 from CW1's prostitution. When asked, COOK confirmed that she, SHAMP and CW1 set up the prostitution advertisement on Backpage.com. When asked about her, SHAMP and CW1 setting up the Backpage.com advertisement, COOK stated, "All of us were. All of us did it". When asked if she had made a bad decision, COOK responded, "Yeah, exactly what it is". When asked, COOK confirmed that CW2 had nothing to do with the prostitution of CW1. COOK stated that she "110%" was not going to do it again, that it was "just a mistake" and "dumb".

Based upon the foregoing, your affiant respectfully submits that there is probable cause to believe that JACOB SHAMP and ASHLEE COOK have violated Title 18, United States Code, Sections 1591 and 1594(c), knowingly recruiting, enticing, harboring, transporting, providing and obtaining a person, that had not attained the age of 18 years and would be caused to engage in a commercial sex act, and conspiring with another to violate United States Code Section 1591.



BARRY W. COUCH
Special Agent
Federal Bureau of Investigation

Sworn to before me this
21 day of January 2015.



HON. JONATHAN W. FELDMAN
United States Magistrate Judge